July 15, 2008

John Auerbach, Commissioner Massachusetts Department of Public Health 250 Washington Street Boston, MA 02108-4619

Re: DPH Proposed Green Building DON Guidelines

Dear Commissioner Auerbach,

The Beth Israel Deaconess Medical Center would like to go on record as supporting the MHA letter submitted on July 10<sup>th</sup> by Anuj K. Goel. The ability of an institution to develop a design for a project of DON proportions that will be at least 50% compliant with LEED, GGHC, or other Department approved best practice standards does require thought and planning and should not be immediately imposed on projects already in the DON submission process. These standards should be foremost in our minds as we continue to be committed to providing a safe and effective care model by using resources that are safe to our patients, our employees, and to the communities we serve. The recommended January 1, 2009 implementation date will give institutions filing for DON projects the needed time to ensure that their design team has incorporated the needed design aspects to meet the 50% minimum compliance and will not penalize those institutions who have already filed for DON approval.

The Beth Israel Deaconess Medical Center also agrees with the MHA letter bullet point #2 that requests that "DON Renovation" projects not be required to meet the 50% criteria but have renovation projects be required to target the 38% goal of available points. Also stated in the MHA response, a significant amount of our institutions "DON Renovation" projects are internal and would not afford us the opportunity to take advantage of the site work and potential exterior LEED points associated with this type of work. Also, the institutions of the Longwood Medical Area have another challenge in achieving the 38% goal for renovation projects as we receive our utilities from the MATEP power plant and there are many restrictions as to what can or cannot be done in the use of electricity, chilled water, and steam and since they are not a part of our on-site utility production we may not be able to count the points toward a LEED goal.

The Beth Israel Deaconess Medical Center is and has been committed to being environmentally friendly over the last several years. We have had a major emphasis and spent a significant amount of capital dollars for the upgrading of our lighting systems to maximize light output while minimizing power utilization. BIDMC has also been involved in water conservation installing low flow faucets and toilet fixtures as appropriate. BIDMC has also made a full commitment to replacing

all mercury manometers with aneroid manometers to eliminate the potential mercury spills in our patient care areas. These types of on-going programs may create challenges as we develop plans for DON renovation projects in meeting the 38% goal of potential LEED points but it is a challenge worth addressing. BIDMC will continue to work with the MATEP management to achieve the energy savings that are right for our institution and the environment. As you can see we are committed to being a good citizen and being pro-active in being environmentally friendly.

The Beth Israel Deaconess Medical Center supports the DPH proposed Green Building Guidelines for DON projects with the above considerations and would be happy to be part of an advisory workgroup of providers and advocates to develop a mechanism and point system that is achievable and realistic to be included in each of our institutions current environmentally friendly operational practices both for renovations and everyday activities.

Should you have any questions about our comments, please feel free to contact me at (617) 632-8227. We at BIDMC look forward to working with the Department in finalizing the guidelines.

Sincerely,

Dennis G. Monty

Dennis G. Monty Director of Facilities Planning and Special Projects Beth Israel Deaconess Medical Center One Deaconess Road Boston, MA 02215